

EXHIBIT 157

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

Pursuant to 28 U.S.C. § 1746(2), I, Christina Ridder, hereby declare as follows:

1. I am over the age of 18. I have personal knowledge—based on the performance of my professional duties, my training and experience, and upon my review of pertinent business records—of the matters stated herein, and if called as a witness, I could and would testify competently thereto.

2. I am the Assistant Vice President for Student Access and Success, Diversity, and Multicultural Student Services at Portland State University (“PSU”). In that capacity, my primary duty is to perform diversity and inclusion work for and with students, with the focus of ensuring that students successfully graduate from PSU. Such work entails holistic, wrap-around advising for students, *i.e.*, providing students with the services they need in order to succeed at PSU. Because students from diverse backgrounds often have unique needs, the diversity and inclusion focus of my work is to provide the unique services needed by students to support them in their growth and development. Some examples include: referrals to Student Health and Counseling, community services, Student Legal Services, Financial Services, or Housing; providing programs regarding their identity; and providing supplemental academic, cultural and community advising. I began my current position at PSU in November 2012. Prior to that, I worked in higher education at the University of Texas at Austin (“UT”) for 16 years. I began at UT as a program coordinator in 1996, I became the diversity recruiter for the UT business school in 1999, the assistant director of student life for the business school in 2005, and I became the director of student life for the business school in 2009. I obtained my bachelor’s degree (BA) in interpersonal communication from Nebraska Wesleyan University in 1993. I obtained my master’s degree (MS) in college student personnel from Kansas State University in 1996. Finally, I obtained my doctorate (PhD) in higher education administration from UT in 2011.

3. PSU is Oregon’s most diverse and affordable public research university. As such, it offers tremendous opportunity to over 27,000 students from all backgrounds. PSU’s core institutional mission is to serve and sustain a vibrant urban region through our creativity,

collective knowledge, and expertise; to be dedicated to collaborative learning, innovative research, sustainability and community engagement; to educate a diverse community of lifelong learners; and to have a global impact through research and teaching. Moreover, PSU is dedicated to the following values: to promote access, inclusion, and equity as pillars of excellence; to commit to curiosity, collaboration, stewardship, and sustainability; to strive for excellence and innovation that solves problems; and to treat everyone with integrity and respect. Through its pursuit of these missions and dedication to these values, PSU serves as an anchor institution—*i.e.*, it provides the Portland region with a highly educated population, it has a substantial economic impact, and it makes distinctive contributions to the Portland region's culture. It also contributes unique scholarship and research that supports quality of life through problem solving, and it delivers on its access mission of contributing to a highly educated and diverse community.

4. PSU does not specifically collect data or track the number of Deferred Action for Childhood Arrivals (“DACA”) recipient students enrolled at PSU. However, PSU is subject to Oregon's “tuition equity” law, codified at Or. Rev. Stat. § 352.287. Under that statute, an Oregon public university “shall exempt a student who is not a citizen or a lawful permanent resident of the United States from paying nonresident tuition and fees for enrollment” if the student meets certain criteria. Currently, there are approximately 100 students at PSU who pay in-state tuition and fees, pursuant to the tuition equity law. Although PSU does not know the exact number, I am aware that a certain percentage of those tuition-equity students are in fact DACA recipients. I am also aware that PSU employs DACA recipients in various capacities, including as student employees and graduate assistants.

5. As an urban public university, PSU's student body includes a significant number of students who are first-generation students, non-traditional students, students with children, returning veterans, and others with significant personal and financial responsibilities. As a

result, a significant number of PSU's students work full-time or part-time while also pursuing their higher education.

6. The rescission of the DACA program harms PSU in a variety of ways. First, it harms PSU's revenues derived from currently-enrolled students. DACA recipient students taking 15 credits per term at the base resident tuition rate pay tuition of \$7,403 per academic year, and mandatory fees of \$1,380 per academic year, for a total of \$8,783 per academic year. Students may also pay for classes outside of the academic year (*i.e.*, during the summer); pay a variety of other fees; and pay for services on campus, such as dining, parking, housing, etc. Although some DACA recipient students may elect to continue their education at PSU, we assess that it is highly likely that some DACA recipient students will drop out, either upon or in anticipation of rescission. It is likely that DACA recipient students who are no longer able to work—either at PSU or elsewhere in the community—will be unable to continue to afford higher education and will leave the university. In addition, it makes little sense for DACA recipient students to continue their education when they are subject to arrest and deportation, and when they cannot apply their education by working in the community. And obviously, any student who actually is arrested and deported will be unable to continue their education at PSU. Thus, for every full time DACA recipient student that either drops out, or is forced out, as a result of DACA rescission, PSU will lose *at least* \$8,783 annually.

7. Second, DACA rescission will likely harm PSU's future revenues derived from prospective students. As an access institution, PSU strives to enroll every prospective student who meets PSU's admission standards and seeks an education at PSU. Accordingly, we assess that PSU's future revenues will be negatively impacted by the fact that students, who would otherwise have qualified for DACA, likely will elect not to apply to PSU in the first place. The threat of arrest and deportation, and the inability of such students to work in the United States, will strongly disincentive such students from expending the resources to obtain an education at PSU.

8. Third, because it will deprive PSU of current and future students, DACA rescission will result in a loss to PSU's alumni community. Such loss may reasonably be expected to result not only in decreased financial contributions from alumni, but also a loss in other contributions, as PSU alumni frequently donate their time and talent to their alma mater. The degradation of PSU's alumni base will also result in a decreased ability to connect current students with alumni, for purposes of mentoring, networking, and career development.

9. Fourth, DACA rescission will harm PSU's offices and departments that rely on student employees. PSU employs students in a variety of capacities, such as office assistants, student mentors, program planners, graduate assistants, *etc.* I am aware that some DACA recipient students work in such capacities. We employ such students for their cultural expertise, talent, and contributions to our offices. Loss of these student employees will harm PSU departments and the services they provide to our students and community.

10. Fifth, DACA rescission will harm PSU by depriving it of non-student employees who are DACA recipients. As both an employer and an institution of higher education, PSU expends significant resources on the training and ongoing professional development of employees. The retention of employees is a core PSU human resources policy and practice, and the federally-required layoff of staff is a harm to the university.

11. Sixth, DACA rescission harms PSU's educational mission. PSU was created specifically as an access institution and quickly developed a social justice mission—one fundamental to, and thus inseparable from, its educational mission. For example, in its early days, PSU's educational and social justice mission was to serve veterans returning from the battlefields of World War II. From its start of 220 students in 1946, to its current role of serving over 27,000 students, PSU has become the most diverse institution in Oregon with 28% of our students identifying as a racial/ethnic minority. That very diversity drives the educational excellence central to the PSU educational mission, in that it allows all students to learn from each other through their in-classroom and out-of-classroom co-curricular experiences. Our

students benefit from guided discussions and difficult conversations about race, history, and contemporary issues, including the issue of immigration. The loss of DACA recipient students would create a loss of nuanced and deep learning for other students. Simply put, those voices and experiences—so critical to our students’ learning and development—will be gone.

12. Seventh, from my recent personal interactions and communications with both returning and prospective students, I know that DACA rescission has already generated significant mental and emotional distress among enrolled and prospective DACA recipient students. In particular, DACA recipient students are tremendously stressed about their ability to plan for their futures, including both immediate plans (for example, finishing their degrees) and long term plans (for example, finding employment). This stress is compounded by the fact that some of our DACA recipient students are first-generation college students, who are counted-upon by their families as a source of future financial stability. Thus, DACA rescission has profound implications for the mental health and functionality of our students—a phenomenon that, in turn, distracts from our students’ learning and grossly undermines our ability to fulfil our educational mission.

13. Finally, it is important to note that PSU’s educational mission is not limited to the work that our students perform in the classroom. The Portland region retains many of our alumni who work and raise families within miles of the university. The motto of PSU, “Let Knowledge Serve the City,” is reflective of the connection that we have to the greater community. The loss of any student harms the ability of PSU to fulfill our mission; however the loss of our DACA students also impacts the economic stability of an entire community of people in Portland.

Many of our students are looking to support their extended families and to bring stability to their neighborhoods. Removing the potential for success for our DACA recipient students will impact future generations, in turn harming our state and region.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED September 8, 2017.


CHRISTINA RIDDER